

OA 91 Criminal Complaint

United States District Court

NORTHERN

DISTRICT OF

CALIFORNIA

UNITED STATES OF AMERICA

V.

DENEAL BOBO
717 Hayes Street
San Francisco, CA

CRIMINAL COMPLAINT

Case Number: 3 08 70483

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state that the following is true and correct to the best of my knowledge and belief. On or about October 23, 2007 in San Francisco County, in the Northern District of California defendant(s) did,

(Track Statutory Language of Offense)

knowingly and intentionally distribute or possess with intent to distribute a controlled substance, to wit crack cocaine and cocaine salt in violation of Title 21, United States Code, Section 841(a)(1).

in violation of Title 21 United States Code, Section(s) 841(a)(1)

I further state that I am a(n) FBI Special Agent and that this complaint is based on the following facts:
See Attached Affidavit in Support of Complaint

Continued on the attached sheet and made a part hereof:

☒ Yes ☐ No

Approved

As To

Form:

AUSA

Sworn to before me and subscribed in my presence,

7-28-08

Date

Honorable Maria-Elena James

Name & Title of Judicial Officer

United States Magistrate Judge

Name/Signature of Complainant

at

San Francisco

City and State

Signature of Judicial Officer

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Jonathan Dubin, declare and state the following:

1. I am employed as a Special Agent for the Federal Bureau of Investigation (FBI), and have been so employed since June, 2003. During my employment with the FBI, I have been assigned to investigate cases involving violent crime, violent gangs and drug trafficking activity out of the FBI's San Francisco office. I have received training at the FBI Academy in Quantico, Virginia, to include training on Violent Street Gangs, Criminal Case Management, Informant Development, and Title III investigations. Before joining the FBI, I served for approximately four and a half (4.5) years as an Assistant State's Attorney with the Cook County State's Attorney's Office in Chicago, Illinois.
2. I am one of the case agents investigating the criminal activities of members and associates of the Uptown and Downtown gangs both set in the Fillmore District of San Francisco, California. Based on my personal participation in this investigation, and my analysis of reports made by other law enforcement officers, I am familiar with the facts and circumstances of the overall investigation as well as the facts and circumstance of the crimes which are the subject of this affidavit.
3. This Affidavit is in support of a criminal complaint against DENEAL BOBO for one count of a violation of Title 21 U.S.C. Section 841(a)(1) (Possession with Intent to Distribute Crack Cocaine).

STATEMENT OF PROBABLE CAUSE

4. On October 23, 2007, at approximately 5:11 p.m., members of the San Francisco Police

Department Gang Task Force (GTF) executed a search warrant issued by the Honorable Judge Bolanos of the San Francisco Superior Court. The warrant authorized a search of DENEAL BOBO, his Cadillac with a California license plate of 3CHB987, and his residence at 717 Hayes Street, San Francisco, California.

5. Upon arrival at 717 Hayes St., GTF officers located BOBO sitting in the front driver's seat of his Cadillac, which was parked in front of the residence. Officer Nelson explained to BOBO that there was a search warrant for his person and conducted a search of BOBO on location.
6. Officer Nelson located approximately one ounce of suspected crack cocaine and one ounce of suspected cocaine power contained in four small plastic baggies inside a larger clear baggie, and a digital scale with off-white powder residue in BOBO's right front pant pocket. In BOBO's left front pant pocket, Officer Nelson located \$1,825.00 (90 x \$20 bills, 1 x \$10 bill, 3 x \$5 bills). Officer Nelson seized these items as evidence.
7. Through his training and experience, Officer Nelson believed the off-white rocks to be crack cocaine, the off-white powder to be powder cocaine, the scales to be used to weigh narcotics for later sales, and the US currency to be profits from narcotics sales. It should also be noted that BOBO had no tools to ingest the narcotics on his person or his vehicle.
8. Pursuant to the search warrant, GTF Officer Griffin searched the upstairs south bedroom of the residence at 717 Hayes St. and located indicia in the name of DENEAL BOBO, plastic baggies suspected to be used to package narcotics, narcotics cooking

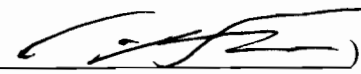
paraphernalia (described as a black deep fryer, two clear glass jars, one fork, one spoon, one knife, and one strainer, all with white powder residue) on the bedroom dresser.

Through Officer Nelson's training and experience, he believed that the baggies were used to package narcotics for later sales and the cooking paraphernalia was used to cook powder cocaine into crack cocaine.

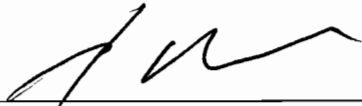
9. BOBO was transported to Northern Station pending further investigation, and the evidence from his person and bedroom was booked at Southern Police Station, with the exception of the suspected narcotics, which were transported to the Hall of Justice drop box by Officer Nelson.
10. On October 26, 2007, Stefanie Pagano of the San Francisco Police Department Crime Lab conducted narcotics analysis of the suspected cocaine seized from the front right pant pocket of DENEAL BOBO. This analysis confirmed that the suspected narcotics were 23.23 grams (net) of cocaine base and 22.36 grams (net) of cocaine salt.

CONCLUSION

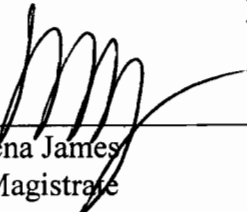
11. Based upon the foregoing evidence, including physical evidence and police officer observations, there is probable cause to believe that DENEAL BOBO did knowingly and intentionally distribute or possess with intent to distribute a controlled substance, to wit crack cocaine and cocaine salt, in violation of Title 21, United States Code, Section 841(a)(1). I therefore respectfully request a warrant be issued for their arrest.

(Approved as to form: )

AUSA William Frentzen


Jonathan Dubin, Special Agent
Federal Bureau of Investigation

SWORN AND SUBSCRIBED TO BEFORE ME
THIS 28 DAY OF July 2008 AT 3:48 ~~28~~ AM PM.


Hon. Maria-Elena James
United States Magistrate